

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

<p>In re:</p> <p>FIELDWOOD ENERGY LLC, <i>et al.</i>,</p> <p style="text-align: center;">Debtors.¹</p>	<p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p>	<p>Chapter 11</p> <p>Case No. 20-33948 (MI)</p> <p>(Jointly Administered)</p>
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**LLOG EXPLORATION OFFSHORE LLC’S RESPONSE TO
DEBTORS’ FIRST OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM
(AMENDED & SUPERSEDED CLAIMS AND DUPLICATE CLAIMS)
[Related to Docket No. 1357]**

LLOG Exploration Offshore LLC (“LLOG”) hereby files this *Response to Debtors’ First Omnibus Objection To Certain Proofs Of Claim (Amended & Superseded Claims And Duplicate Claims)* (the “Objection”) (Docket No. 1357) and states as follows:

1. On October 14, 2020, this Court entered that certain *Order (I) Establishing Deadline to File Proofs of Claim and (II) Approving Form and Manner of Notice Thereof* (the “Bar Date Order”)² which provides that holders of claims “shall file a separate Proof of Claim in the bankruptcy case of each Debtor against whom a claim is asserted.”³

2. LLOG’s claims are premised upon an offshore operating agreement in which Debtor Fieldwood Energy Offshore LLC is a party and which covers offshore oil and gas leases

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy LLC (6778), Fieldwood Energy Inc. (4991), Fieldwood Onshore LLC (3489), Fieldwood SD Offshore LLC (8786), Fieldwood Energy Offshore LLC (4494), Fieldwood Offshore LLC (2930), GOM Shelf LLC (8107), FW GOM Pipeline, Inc. (8440), Galveston Bay Procession LLC (5703), Galveston Bay Procession LLC (0422), Fieldwood Energy SP LLC (1971), Dynamic Offshore Resources NS, LLC (0158), Bandon Oil and Gas, LP (9266), and Bandon Oil and Gas GP, LLC (9172). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

² Docket No. 466.

³ Docket No. 466 at p. 2.

in which Debtor Fieldwood Energy Offshore LLC is a co-interest owner. As such, LLOG believes Fieldwood Energy Offshore LLC to be the appropriate entity against whom to assert its claims.

3. Accordingly, LLOG timely filed its Proof of Claim on the claims register in the bankruptcy case styled as *Fieldwood Energy Offshore LLC*, Case No. 20-33950. That proof of claim is identified on said claims register as Claim No. 6-1, a copy of which is attached hereto as **Exhibit A**.

4. Although LLOG believes Fieldwood Energy Offshore LLC to be the correct and appropriate Debtor against whom to assert its claims, Debtors appeared to have scheduled LLOG's claim as against Fieldwood Energy LLC. *See* Schedule # 4884833.

5. Accordingly, in an abundance of caution, LLOG timely filed an identical Proof of Claim on the claims register for the bankruptcy case captioned *Fieldwood Energy LLC, et al.*, Case No. 20-33948. This proof of claim is identified on said claims registers as Claim No. 90-1, a copy of which is attached hereto as **Exhibit B**.

6. LLOG filed Claim No. 90-1 out of an abundance of caution based upon information provided in Debtors' Schedule and consistent with the requirement that "a separate Proof of Claim [be filed] in the bankruptcy case of each Debtor against whom a claim is asserted."⁴

7. Debtors have objected to Claim Nos. 6-1 and 90-1 as "duplicate claims" and have requested an order from this Court "disallowing and expunging each claim identified on Schedule 2 to the Proposed Order . . . in its entirety because each such claim is duplicate of a Remaining Claim."⁵ Debtors have registered both proofs of claim as being against Fieldwood Energy

⁴ *See* Bar Date Order, Docket No. 466 at p. 2.

⁵ Docket No. 1357 at p. 2.

Offshore LLC, and the Remaining Claim appears identical to the LLOG's Proof filed as Claim No. 6-1.⁶

8. Consistent with its reservation of rights in the Proofs of Claim it filed, LLOG continues to reserve its rights as to whether or not the entirety of its claim is a secured claim through the GC OOA as defined in the Proofs of Claim and/or whether its rejection damages claim it intends to file associated with rejection of the GC OOA constitutes a secured claim in its entirety.

9. For these reasons, LLOG does not object to the treatment proposed on Schedule 2 to the Objection, but only to the extent that all of LLOG's rights associated with Claim No. 6-1 are expressly preserved.

Dated: June 4, 2021.

Respectfully Submitted,

LOOPER GOODWINE P.C.

/s/ Paul J. Goodwine

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⁶ Docket No. 1357 at p. 8.

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of June, 2021 a true and correct copy of the foregoing document was served via this Court's CM/ECF system on all parties having consented to such electronic service in this case.

/s/ Paul J. Goodwine
Paul J. Goodwine